

EXHIBIT 2

From: Edward ReBrook, ESQ
Sent: Tuesday, December 17, 2019 8:48 AM
To: Michael Bloch
Subject: Fwd: Discovery deficiencies and violations

Mr. Bloch:

Attached please find my client's responses to your discovery demands, including documents to back up our assertions. Please keep in mind that my control over my client(s), especially Mr. Colucci, is quite limited, especially now that a conflict has arisen between him and my real client, Mr. Schoep. If you are able to provide me with specifics of what type of cooperation you want from Mr. Schoep, I believe that his participation is far more likely.

1. Request to produce to third-party discovery vendor Mr. Colucci's iPhone: Mr. Colucci respectfully declines to co-operate with Plaintiff's request for his iPhone. Mr. Colucci continues to maintain that neither he or his Florida domestic non-profit corporation "The National Socialist Movement Corporation" are not a party to this litigation and therefore refuses to consent to any discovery requests in regards to the now dissolved Michigan Non-Profit Corporation "National Socialist Movement". Mr. Burt Colucci stated in his deposition that according to the Michigan Department of Licensing and Regulatory Affairs that Mr. James Hart Stern was the President of the National Socialist Movement at the time the corporation was dissolved. Mr. Stern is now deceased.
2. Mr. Colucci will not produce to the third-party discovery vendor his computers or electronic devices. Mr. Colucci maintains that neither he nor his Florida non-profit "The National Socialist Movement" are parties to this litigation. According to Mr. Colucci, he was an inactive member in the Michigan non-profit "National Socialist Movement" (NSM) until around Feb/April of 2018 when he became the Chief of Staff to the former Commander Jeff Schoep of the NSM. Mr. Colucci never attended the Unite The Right Rally or had anything to do with the organizing/planning of the UTR.
3. The NSM has already produced several times certifications listing Social Media accounts and Electronic Devices that may contain any potentially relevant Documents and Electronically Stored Information. In the email requesting a new certification, it is said that Mr. Colucci's testimony on December 10, 2019 established that the NSM's certification dated December 6, 2018 was "woefully deficient". The current Authorized Representative of the now dissolved Michigan non-profit "National Socialist Movement" corporation is unaware of the previous certifications that have been recorded and requests a copy of the December 6, 2018 certification

and any other certifications so that a new updated certification may be completed for discovery.

4. To the best of my clients' knowledge the third-party vendor has an accurate record of credentials to each of the Social Media Accounts listed on the certifications provided to the Plaintiffs.
5. The current Authorized Representative of the National Socialist Movement, a now dissolved Michigan non-profit corporation, is Acacia Dietz. Acacia Dietz is the authorized representative of the NSM that provided answers for the Plaintiffs' Second Set of Interrogatories submitted on November 29, 2019.
6. Due to the change in legal representation, the current Authorized Representative of the NSM does not have the responses to Plaintiffs First Set of Requests for Production of Documents or Plaintiffs' First Set of Interrogatories to All Defendants. These were previously submitted by my clients' prior legal counsel, Mr. Kolenich and the current Authorized Representative does not have copies of these. If the Plaintiffs would be gracious enough to provide my client, NSM, with these responses, the current Authorized Representative is willing to go over and make any corrections deemed necessary. My client, NSM, is willing to review the original responses and make sure that all are complete and accurate to the best of their knowledge.
7. My client, Mr. Schoep, has already provided his iPhone 6 to the third-party discovery vendor for imaging in accordance with the court's order. There is no reason why Mr. Schoep should provide his new phone to the third-party vendor for imaging when this was obtained well after Charlottesville and therefore would not contain any potentially relevant information in regards to this litigation.
8. Attached is a photocopy of the February 26, 2019, affidavit signed by Jeff Schoep on February 27, 2019, that is referred to and embedded in the article entitled "Neo-Nazi Group Vows To Wrest Control Back From Black Activist" by Allegra Kirkland (available at: <https://talkingpointsmemo.com/muckraker/fight-national-socialist-movement-james-hart-stern>) The original copy of the affidavit was mailed to Mr. James Hart Stern and it is believed that Mr. Stern's attorneys in the California case *RIC 1901763 Stern vs. Schoep* would be in possession of the official copy of this document. Attached is the complaint for *Stern vs. Schoep RIC 1901763* in which copies of this document are also found.
9. Several investigations for responsive documents and communications from custodians associated with my client, NSM, have been made by my client, Mr. Schoep. He has made attempts to contact former members of his past organization to no avail. According to members of the now dissolved Michigan non-profit corporation "National Socialist Movement", Jeff Schoep is a "race traitor" and everyone refuses to communicate with him. Attached are several public VK posts showing the former members publicly expressing their hatred

for their former commander and calling for Mr. Schoep's death. According to Mr. Colucci's testimony on December 10, 2019 he said that he was unaware of any investigation. This does not mean that no investigation has taken place. This simply means that Mr. Colucci is not aware of any investigation that may have taken place on behalf of my client the NSM.

Attached are several documents. The Memorandum in Compliance (Doc. 575 & Exhibits) that was submitted to the court on October 18, 2019 in addition to the Supplemental Response for Mr. Schoep's Bitchute answer along with his explanation submitted to the court on the same date. In addition to these documents, documentation from the Michigan Department of Licensing and Regulatory Affairs concerning the now dissolved Michigan non-profit corporation NSM are also attached. Showing the previous corporate positions held and by what individuals all the way to the time it was dissolved in June 2019.

My Client, Jeff Schoep, has complied to the best of his ability all that has been asked for by the Plaintiff's and by the Court. There is no valid reason why a motion for sanctions in which Plaintiffs seek adverse inferences against Mr. Schoep should be brought before the court as he has complied with discovery.

Best regards,

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